

The Honorable Paula L. McCandlis

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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRENTICE C. HOLLINGSWORTH,

Defendant.

NO. MJ **20-094**

COMPLAINT FOR VIOLATION

18 U.S.C. § 2422(b)

BEFORE the Honorable Paula L. McCandlis, United States Magistrate Judge, United States Courthouse, Seattle, Washington.

COUNT ONE

(Attempted Sex Trafficking of a Juvenile)

Beginning on or about January 16, 2020, and continuing through January 23, 2020, in King County, within the Western District of Washington, and elsewhere, PRENTICE C. HOLLINGSWORTH did, in and affecting interstate commerce, knowingly attempt to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, an individual who had not attained the age of 18 years, knowing, and in reckless disregard of the fact, that this individual would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

COUNT TWO
(Attempted Enticement of a Minor)

Between in or about January 16, 2020, and on or about January 23, 2020, in King County, within the Western District of Washington, and elsewhere, PRENTICE C. HOLLINGSWORTH used a means and facility of interstate and foreign commerce to knowingly attempted to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

And the complainant states that this Complaint is based on the following information:

I, Detective Jennifer Gardner, being duly sworn under oath, depose and say:

INTRODUCTION

1. I am a Detective with the Seattle Police Department (SPD) and have been employed there for eleven years. I completed the Washington State Basic Law Enforcement Academy in 2008. I am presently assigned to SPD's Vice/High Risk Victim's Unit and also have been designated as a Task Force Officer (TFO) for the Federal Bureau of Investigations (FBI)'s Child Exploitation Task Force. I have been assigned to the Vice/High Risk Victims unit since June 2018, with the primary responsibility of investigating crimes of prostitution (to include patronizing and promoting), adult entertainment violations, gambling, and alcohol-related offenses.

2. I spent the bulk of my previous eleven years in law enforcement on patrol in the East Precinct of Seattle. While working patrol, I dealt with street-level narcotics and demonstration management, as well as general patrol responsibilities. Since joining the Vice/High Risk Victims unit, I have had training in prostitution and narcotics investigations. I have participated in or assisted with over 100 undercover "sting" operations and have been the primary undercover on over 80 contacts that resulted in an arrest. These contacts were from street, hotel, underage and pimp operations. I am familiar with the geography, street terms, and sub-culture of prostitution

1 (promoting/patronizing), including human trafficking. I have also received on-the-job
2 training from the experienced detectives and supervisors in the Vice/High Risk Victims
3 unit who have conducted innumerable vice and sex trafficking investigations.

4 3. In the course of my duties, I participate in the exchange and discussion of
5 information related to vice and trafficking investigations with other local, state, and
6 federal agencies. In addition, I have completed the 80-hour SPD undercover school and
7 have regularly volunteered to work the school to teach others about undercover work. I
8 have also completed the Advanced Human Trafficking training put on by a Seattle Police
9 Vice/High Risk Victims detective, Forensic Child Interviews and Interrogation training
10 put on by the Washington State Law Enforcement Academy, as well as other trainings. In
11 addition, I have both attended and instructed at the Northwest Regional Internet Crimes
12 Against Children (ICAC) conference. I also attend annual training through the Seattle
13 Police Department specific to investigations, case law, case management, interview and
14 interrogation, and other continuing education. My investigation responsibilities in my
15 current unit are conducted in both an undercover and traditional detective capacity.

16 4. The facts set forth in this Complaint are based on my investigation, along
17 with investigation by other law enforcement officers, conversations with law enforcement
18 officers, and review of law enforcement documents. It also does not purport to state
19 every fact known to law enforcement, but rather only those facts I believe necessary to
20 establish probable cause to conclude that PRENTICE C. HOLLINGSWORTH committed
21 the offenses charged in this Complaint. As further detailed below, based on my
22 investigation, I submit there is probable cause to believe that HOLLINGSWORTH
23 committed the offense of enticement of a minor.

24 **SUMMARY OF THE INVESTIGATION**

25 5. This investigation involves online undercover activity on an internet-
26 messaging platform called Tagged.com (hereinafter "Tagged"). Although Tagged has
27 legitimate uses, it also is known to law enforcement as a platform used by individuals
28

1 | who are interested in the sexual exploitation of children and adults. They use this
2 | platform to exchange messages about child and adult sexual exploitation.

3 | 6. In my capacity as a detective in the Vice/High Risk Victims Unit, I
4 | maintain an online presence on various internet-messaging platforms in an undercover
5 | role. On January 16, 2020, I was contacted on my undercover multi-media profile on
6 | Tagged by a male whose name ("handle") was "Prentice H." and who I subsequently
7 | identified as PRENTICE C. HOLLINGSWORTH. HOLLINGSWORTH sent me a
8 | message saying, "What's good? How r u today; U busy??" I responded back and we
9 | exchanged several introductory greetings.

10 | 7. Soon after this initial contact, HOLLINGSWORTH and I began sending
11 | online messages back and forth on Tagged. Early on in the conversation,
12 | HOLLINGSWORTH asked me "what r u looking for??" I responded, "I'm on here for
13 | dates \$\$. " HOLLINGSWORTH then responded: "Oh I see . . . i am on here to meet a
14 | great woman and to get to know and maybe build an empire together. I make money in
15 | everything I do and possibly we can work together." I then asked HOLLINGSWORTH,
16 | "how can we work 2gether?" He stated: "Well the game your in I am a professional in . .
17 | . i have made thousands." I replied, "oh really?!?! thats good 2 know!" He then said, "if u
18 | want u can call me at 253-325-3151 and we can discuss the situation further. You might
19 | find urself with better opportunities if we work together." I am aware, based upon my
20 | training and experience that the phrase "dates" is often used by individuals in the
21 | prostitution industry to describe prostitution customers. I am further aware that the
22 | phrase "the game" is a colloquial term used to describe the prostitution industry.

23 | 8. A short time later, I sent HOLLINGSWORTH a text message from an
24 | undercover phone number to the phone number he had sent me. During the beginning of
25 | our text message conversation he asked me "...how long u been in the game??" I
26 | responded, "Off and on. I do it when I need \$. I have a couple SD that help." I am aware,
27 | based upon my training and experience, that the term "SD" is often used in the
28 | prostitution industry to refer to a "sugar daddy." HOLLINGSWORTH told me "that's

1 | what's up . . . i been apart of it for 15 years . . . and I have a couple girls that have made
2 | over a million in one year." After I responded with, "What! No way!",
3 | HOLLINGSWORTH replied, "Yes way . . . i told u I am good at what I do . . . r u
4 | interested in making that kind of money."

5 | 9. We exchanged some more text messages after that, but then I stopped
6 | responding to him. On January 18, 2020, I received a missed phone call on my
7 | undercover phone from HOLLINGSWORTH's number at 9:55 a.m. He texted me early
8 | that morning and I responded later that day. We then had another texting conversation
9 | where I told HOLLINGSWORTH that "I got busy yesterday & then got in trouble last
10 | night." He asked me why I got in trouble and I told him that "I didn't come back to the
11 | place I'm staying on time. Got my phone taken. Whatever." He asked, "Where r u staying
12 | at where they take your phone??" I told him that I was at "a juvie place."
13 | HOLLINGSWORTH then asked me, "How old r u." I responded "Really wanna knw?"
14 | and he texted back "Yes [thumbs up emoji]." I told him "15." HOLLINGSWORTH
15 | responded "U r hella young girl . . ." He then started asking me what "juvie place" I was
16 | staying at and if I could talk on the phone. I told him that I was with friends and could
17 | not talk. HOLLINGSWORTH sent a text message asking break away from my friends
18 | and go for a walk so that we could talk "for 10 minutes." After I told him I couldn't break
19 | away he asked, "R u sure u wanna stay in this game?" I told him, "Yea. So far I've liked
20 | it and had no problems. I've never worked w ne1 [anyone] so I'm not sure how it will
21 | work." He responded that it will "work perfectly and better with more money, but we
22 | gotta talk." I said, "K" and he said, "But we got alot to discuss."

23 | 10. We continued to text, and HOLLINGSWORTH stated "If u choose with me
24 | and I keep it real then we will make alot of money." I asked, "Where would I wrk? Street
25 | or rooms?" he said, "Rooms and anywhere u feel comfortable working." I am aware, as a
26 | result of my training and experience, that the phrase "choose" or "choose up" is used in
27 | the prostitution industry to refer to the process by which a pimp takes "ownership" or
28 | control over a prostitute/victim.

1 11. After this conversation, HOLLINGSWORTH called me twice on Sunday
2 and twice on Monday, and sent me a couple of text messages on Sunday, to which I did
3 not respond.

4 12. Based on 1) my training and experience; 2) the fact that
5 HOLLINGSWORTH continued to contact me after I told him that I was only fifteen
6 years old and that I make money on dates; 3) the fact that HOLLINGSWORTH used key
7 words used by pimps such as “choosing,” the “game,” and talked about how much money
8 other “girls” he had worked with had made, it was my conclusion that
9 HOLLINGSWORTH was attempting to recruit a person he believed to be a minor into a
10 working for him as a prostitute. Using the pictures of HOLLINGSWORTH that were
11 posted to his Tagged account, I was able to identify “Prentice” as HOLLINGSWORTH
12 through a law enforcement database. A Washington State Department of Corrections
13 officer advised me that HOLLINGSWORTH had been released from prison on
14 December 26, 2019, and was currently residing at a federal halfway house in Tacoma,
15 Washington.

16 13. On January 22, 2020, at 5:07 p.m., I spoke with HOLLINGSWORTH on
17 the phone for approximately fifty minutes. Prior to the phone call I asked him in a text
18 message, “R u gunna call or am I?” I told him, “I’m in my room. Snuck my phone up.”
19 HOLLINGSWORTH then responded, “Ok. . . . call me then.” I then called him and we
20 had our first telephone conversation. This phone call was digitally and lawfully recorded
21 with a One-Party Consent Application Order that the King County Superior Court Judge
22 Karen Donohue authorized on January 22, 2020.

23 14. After some small talk, HOLLINGSWORTH asked me how everything had
24 been working out. I explained that I had been getting “dates” online.
25 HOLLINGSWORTH then asked how much I was paid. When I asked for clarification,
26 he said “I mean for like a B.J., how much are you getting paid for a B.J?” (I am aware
27 through my training and experience that “B.J.” is a slang term for “blow job” or oral sex).
28 I replied that I got paid \$60, then said that I did not know whether that was “good” or

1 “bad.” HOLLINGSWORTH replied “that’s not good.” He then continued to tell me that
2 my price was “too low” and that I should be getting “nothing less than 100, easy.”
3 HOLLINGSWORTH further stated that: “Well because you gotta think about it, your age
4 for one, the way that you look you know what I’m saying, that jacks up everything...”
5 He told me that I should be charging “way more” because I’m “in a better position.” He
6 said, “Yeah you should be getting 100 on that and if you’re doing everything you could
7 probably charge 250. How much are you charging for the other stuff?” I asked, “For like
8 sex?” and he said “yeah” I told him I charged \$100. HOLLINGSWORTH then told me I
9 was “definitely undercutting [my]self, hella big time.”

10 15. I told him that this was still new to me, and that I was trying to figure things
11 out because there were many customers that did not like using condoms.
12 HOLLINGSWORTH responded: “That’s an automatic no-no. Never do nothing without
13 one, ever.” HOLLINGSWORTH further explained that even if “you’re giving a bj
14 you’re supposed to use a condom.” He told me to go to a clinic and get free condoms and
15 keep some in my purse.

16 16. HOLLINGSWORTH then told me that if I did “10 dates every couple of
17 days, I’d keep ya over 1,000 in your pocket all the time.” I asked him what he thought of
18 all of this, and he said, “Personally, I don’t think you should be doin’ it, because of your
19 age and shit like that, and plus you know what I’m saying, you don’t have a manager
20 that’s you know what I’m saying that’s physically in your life to where they can protect
21 you and make sure nothing happens to you, you’re doing it all on your own so, I mean
22 you gotta just know that you’re putting yourself in a bad situation if something go down
23 and no one is there...” He later said that “you’re gonna do what you’re gonna do and you
24 know what I’m saying, if you’re gonna do it, you might as well do it right.” Based upon
25 my training and experience, I interpreted HOLLINGSWORTH to be saying that if I was
26 going to engage in prostitution as a minor, I should work for a pimp to protect myself.

27 17. HOLLINGSWORTH asked me what other websites I was on, and I told
28 him that I was not on any other sites. HOLLINGSWORTH told me to get on “POF,” and

1 later clarified that this was the Plenty of Fish website, which I know from training and
2 experience to be used for dating/hookups, as well as for arranging prostitution dates.
3 HOLLINGSWORTH then asked me if I had any skimpy outfits to take pictures in, and
4 said to put no more than three pictures on my profile page to give me "double the
5 exposure."

6 18. HOLLINGSWORTH also told me that he could get in trouble for even
7 talking to me and instructed me to erase all of our text messages. He suggested that I
8 recruit an older girl who is eighteen or nineteen years old who could rent hotel rooms. I
9 asked HOLLINGSWORTH whether he was my "mentor," and he replied "yeah pretty
10 much, that's up to you though you know what I mean." HOLLINGSWORTH told me
11 that he "used to do this for a living" and "used to be a pimp." He then asked me if I
12 knew what a pimp was. I hesitated, said that I thought so, and asked him what he used to
13 do. HOLLINGSWORTH replied that he used to "pimp . . . I used to recruit girls, I used
14 to train them and teach them everything about the business, teach them how to do
15 everything. My position was hands on." HOLLINGSWORTH explained that some girls
16 did not know how to give a hand job, so he had to teach them how to do it the "proper
17 way." He said that there are different techniques and tricks to cause a male customer to
18 ejaculate "five times faster," which would then allow me to charge them for an hour but
19 only be with them for thirty minutes. HOLLINGSWORTH also told me that I would
20 have to tell customers that I was eighteen or nineteen years old.

21 19. HOLLINGSWORTH then told me that he had just gotten out of federal
22 prison "for this." He continued to talk about "choosing," and that I would have to pay a
23 "choosing fee." I am aware, from my training and experience, that a "choosing fee" is
24 the amount of money a prostitute/victim is required to pay a pimp before she begins
25 working for him. I nevertheless asked HOLLINGSWORTH what a "choosing fee" was,
26 and he replied that at the beginning, it would be "1000," and then after that, we would
27 split everything 60/40. HOLLINGSWORTH said that I would keep "60" and he would
28 get "40," and that part of what he would do with his forty percent would be to book my

1 hotel rooms. He told me he could get a debit or credit card and then add money to the
2 cards to book the rooms.

3 20. HOLLINGSWORTH also asked about how many people contact me online
4 and I told him that a few had but that I could not meet up with all of them because of
5 school. He responded that I was "missing money right there." HOLLINGSWORTH
6 told me that he could "book a room for this weekend, for the whole weekend for Friday,
7 Saturday, Sunday; and then you work the whole weekend, that way you know you can
8 generate enough money that way it could keep you in the room and shit." I asked him
9 where he would book the room and if it would be down where he was. He replied in the
10 affirmative and said that he had to "show [me] the ropes."

11 21. HOLLINGSWORTH also said that he wanted me to send him money so he
12 could put it on a card and then use that money to pay for a hotel room.
13 HOLLINGSWORTH explained that he had a curfew every night so could not stay with
14 me in the hotel room, but would make sure that my room was far away from the office
15 because he would not want the hotel staff to catch on to what I was doing. When he was
16 done explaining how to avoid detection from hotel employees, I asked how I would
17 "choose him." He said, "Yup, tell me I'm choosing you . . ." He then said he wanted to
18 see more pictures of me so he could see what I looked like.

19 22. We continued to engage in small talk about my past, which he asked about.
20 HOLLINGSWORTH told me that if I was going to be in this life, then I need to be in it
21 "all the way." He asked me what my boundaries are on my dates, so I talked about anal
22 sex, and how I do not like to do it, but I will if it brings me more money.
23 HOLLINGSWORTH replied that it would definitely bring more money.
24 HOLLINGSWORTH reiterated that the one thing he did not want me to do is anything
25 without a condom. He also told me later in the conversation that I should never use my
26 real name so as to protect myself and the customer.

27 23. On January 23, 2010, I was in communication with HOLLINGSWORTH
28 by text message and phone calls I informed him over text that I had run away from the

1 place I was staying. A short time later I spoke with him on the phone and told him again
2 that I had run away and that I would be heading south. He told me that he could not
3 leave the facility he was living at, but he would have a friend pick me up from a transit
4 center. He also told me that I should try to get a date online, and have the date pay for
5 the hotel room. During another call, HOLLINGSWORTH told me that his friend
6 "Rocko" was going to send his "girl" to come pick me up. HOLLINGSWORTH later
7 called and stated that he was able to get a motel room at the Glacier Motel in Fife,
8 Washington. He instructed me to ask for "James" when I arrived at the motel and said
9 that "James" would get me into my room, which was already assigned to me as Room 15.

10 24. Around 7:15 p.m., I and several other SPD detectives began driving south
11 towards the Tacoma/Fife area. While traveling, I continued to get text messages and
12 phone calls from HOLLINGSWORTH. HOLLINGSWORTH told me that he wanted
13 me to call him when I got to the Federal Way Transit Center, and that once I arrived he
14 would call his friend and have him pick me up. HOLLINGSWORTH called me multiple
15 times to check on me and see where I was. At one point, while I was still driving south,
16 HOLLINGSWORTH texted me and told me that his friend's "girl" was "trippin" and she
17 did not want to pick me up anymore. I told HOLLINGSWORTH via text message that I
18 would catch a cab from the Tacoma Transit Center and then find someone to book a room
19 for me. When Detective Bill Guyer and I arrived at the Love's Truck Stop, located at
20 1501 33rd Avenue East, in Tacoma, Washington, I told HOLLINGSWORTH via text
21 message that I had met a girl on the bus who had said she would get a hotel room for me.

22 25. Detective Sergeant Diaz, Detective Guyer and I then went to the Glacier
23 Motel where we encountered B.P., who was the manager of the hotel. B.P. advised that a
24 male had called the hotel earlier that evening and had spoken to J.K., who was also
25 working at the hotel. B.P. showed us the motel's automated call log, which indicated that
26 at 7:40 p.m., an incoming call was received from 253-325-3151. I was familiar with this
27 call, as it was the same phone number that HOLLINGSWORTH had used to
28

1 communicate with me in my undercover role as the fictitious fifteen-year-old female. I
2 took a photograph of the call log and the number.

3 26. The other detectives and I also identified the individual named "James"
4 that HOLLINGSWORTH had told me to contact once I arrived. We spoke with J.K.,
5 who is an employee of the Glacier Motel and who was in Room 15 (the same room that
6 HOLLINGSWORTH had told me had been reserved for me). J.K. stated that he had
7 spoken on the phone with a male who had requested that a room be held for the male's
8 "niece" who would be staying for four nights. J.K. told the male on the phone that there
9 were a few rooms available and that he could hold a room. J.K. quoted the male a price
10 of \$240 for four nights. At no time did the male on the phone identify himself.

11 27. In the meantime, SPD and TPD detectives had gone to the residential re-
12 entry center (RRC) where HOLLINGSWORTH was residing pursuant to his supervised
13 release status. At 8:23 p.m., Detective Brathwaite informed me that they had taken
14 HOLLINGSWORTH into custody and would be transporting him to SPD. Detectives
15 Brathwaite and Washington stated that when HOLLINGSWORTH came down to the
16 front desk of the RRC, he had a black cell phone up to his ear but quickly put it in his
17 pants pocket when he saw law enforcement. HOLLINGSWORTH was read his *Miranda*
18 rights at the scene, which he stated he understood and advised that he was willing to talk
19 with detectives. During a search incident to arrest, the detectives located a few personal
20 items on HOLLINGSWORTH, including the black LG cell phone he was holding up to
21 his ear when he saw the detectives. Detectives Brathwaite and Washington transported
22 HOLLINGSWORTH to the SPD's vice office, where Detective Guyer and I met them
23 and conducted a recorded statement of HOLLINGSWORTH.

24 28. HOLLINGSWORTH agreed to speak with us and again he was asked if he
25 understood his rights and would still like to talk with us. He said he did understand his
26 rights and he agreed speak with us and to have his statement/interview recorded. As
27 HOLLINGSWORTH was talking, I immediately recognized his voice as the male I had
28 been speaking to over the phone in my undercover capacity. HOLLINGSWORTH was

1 asked about his social media accounts, and he stated that he uses SnapChat, Facebook
2 messenger and Instagram. He said he did not have Kik, Plenty of Fish, Tagged or Tinder.

3 29. HOLLINGSWORTH said that he lets other people use his phone but does
4 not know all the people who he allows to use his phone. HOLLINGSWORTH stated that
5 at least four other people had used his phone earlier that day, and specifically that a white
6 male with brown hair in his 20s named "James" and a mixed-race, light-skinned male in
7 his 30s named "Bryan" had both used his phone earlier today. (Notably, these
8 descriptions fit the individuals J.K. and B.P. that I had spoken to earlier at the Glacier
9 Motel in Fife who said that they had spoken to a male on the phone about renting a room
10 for his niece.) HOLLINGSWORTH could not think of any of the other names of the
11 people he has let use his phone.

12 30. HOLLINGSWORTH was asked whether he had spoken to any juveniles in
13 the last few days. He denied speaking with any juvenile females online and said that he
14 did not have a Tagged account. Detective Guyer then asked HOLLINGSWORTH if he
15 had spoken to any females over the last few days. HOLLINGSWORTH gave multiple
16 names of females and said that he talks to a lot of females on the phone and online.
17 Detective Guyer asked him specifically whether he had spoken to a fifteen-year-old
18 runaway. HOLLINGSWORTH did not hesitate before saying that he had been talking to
19 a female name "Natalie." He originally said that he met her on the site called Plenty of
20 Fish (PoF) but after a few minutes he said that he did not meet Natalie on PoF, but he met
21 her on Tagged. He said that he believed that she was nineteen years old and was just
22 answering her questions about prostitution since she told him that she was a prostitute.
23 He mentioned that he talked pricing for sex acts and about a "choosing fee" before he
24 found out her age was actually fifteen.

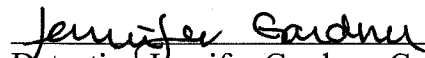
25 31. HOLLINGSWORTH said after he found out that "Natalie" was fifteen
26 years old he stopped talking about sex with her and told her that she should not have run
27 away and that she should go back to the home where she was residing.
28 HOLLINGSWORTH said that "Natalie" told him that she had run away and was

1 catching a bus to head down to Tacoma to him. He stated that he believed she was lying
2 and that she would not head south to be with him.

3 32. There were times during the interview that HOLLINGSWORTH got
4 confused about who he was talking about. He mentioned that "Natalie" said she was
5 already working with a female pimp named "Charmaine."

CONCLUSION

33. Based on the above facts, I respectfully submit that there is probable cause to believe that PRENTICE C. HOLLINGSWORTH committed the offenses charged in Counts One and Two above.


Detective Jennifer Gardner, Complainant
Seattle Police Department

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 27th day of February, 2020.


PAULA L. MCCANDLIS
United States Magistrate Judge